Data Protection Policy

Published – 1st November 2026

Review Date – 1st November 2027

Introduction

Strength and Conditioning Academy Ltd ("the Company") is committed to protecting personal data and ensuring compliance with the EU General Data Protection Regulation (GDPR). This policy sets out the Company's approach to data protection and provides guidance for staff, clients, partners, and third parties.

Scope

This policy applies to all personal data processed by Strength and Conditioning Academy Ltd, electronically (cloud, CRM, LMS, etc.) or in paper form, relating to clients, employees, business partners, and any individual whose data may be handled in the course of business activities.

Data Protection Principles

The Company adheres to the following GDPR principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

Roles and Responsibilities

The Data Protection Officer (DPO) is responsible for GDPR compliance, policy review, staff training, audits, DPIAs, subject request management, breach response, and acting as primary contact for all data matters.

Contact: dpo@strengthconditioning.academy

Categories of Personal Data

The Company collects and processes:

- Client records: names, email addresses, membership/sales history, login details
- Client contracts: engagement agreements, NDAs, signed contracts
- Payment: transaction records, billing addresses, invoices, emails
- Staff: contracts, payroll, next of kin, appraisals, learning & development, CVs, qualifications
- Marketing: names, emails, profession, survey responses

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Systems and Storage

Personal data is securely stored and managed in:

- Google Workspace, Gurucan, Product Dyno, Sendfox, Drip (CRM/LMS)
- ContractHub (contracts)
- Stripe, PayPal, Gurucan, Product Dyno (payments)
- FreeAgent, Google Workspace, ContractHub, Accountants (staff records)
- Squarespace, WebStart, Carrd (web hosting), JotForm, FormNX (data collection), DeepTalk, SimpleX, BoostSpace, SuiteDash, Vbout, Acumbamail (CRM/analytics)
- All physical records are kept in locked storage.

Lawful Basis for Processing

Personal data is processed under one or more lawful bases:

- Contractual necessity
- Legal obligation
- Legitimate business interest
- Consent (documented and managed for marketing/optional analytics)

Data Retention & Disposal

Retention is based on legal, contractual, and operational requirements:

- Client data: membership period + 2 years
- Staff data: 6 years post-employment
- Financial/payment: 6-7 years (compliance)
- Contracts/agreements: minimum 6 years
- Marketing data: as long as consent valid; promptly removed on withdrawal
- All expired data is securely deleted or anonymised.

Data Subject Rights

Individuals have the right to:

- Access, rectify, erase or restrict their personal data
- Data portability
- Object to processing
- Withdraw consent at any time
- Requests are managed via dpo@strengthconditioning.academy and responded to within one month.

Data Protection Impact Assessments (DPIA)

DPIAs are conducted for any project deemed "high risk," including large-scale analytics, AI-enabled processing, new technologies, or profiling activities, following GDPR standards:

- Purpose, scope, and necessity of processing

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- Risks to individuals
- Mitigation measures
- Stakeholder consultation
- Regular review and update
- Completed DPIAs are maintained as separate records and shared with the ICO if required

Security Measures

- Technical and organisational safeguards: encryption, access controls, secure platforms, regular security audits, and confidentiality requirements for staff.
- Regular risk assessments conducted.

Data Audits

- Annual data audits evaluate compliance, ensure systems and records are current, and confirm all processing activities align with this policy and privacy law.
- Audits review data flows, storage, retention, and third-party arrangements.

Staff Training & Awareness

- All staff receive annual training on GDPR/data protection, breach response, subject rights, and policy changes.
- Records of completed training are maintained.

Third-Party Processors & International Transfers

- Data is only shared with third parties (processors) who are GDPR compliant and have documented agreements in place.
- Data processing is restricted to the UK/EU, or uses appropriate safeguards for cross-border transfer.

Breach Reporting & Management

- All staff are required to report suspected breaches immediately to the DPO.
- The DPO conducts prompt investigation, containment, and notification to the ICO and affected parties within 72 hours, if necessary.

Complaints Procedure

Data subjects may raise complaints via [insert DPO email]. Complaints will be investigated and responded to in line with regulatory best practice. Unresolved complaints may be escalated to the Information Commissioner's Office (ICO): www.ico.org.uk.

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Policy Review

This policy is reviewed annually and after any significant changes in law, technology, or business process.

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